UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

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) )	Civil Action No. 05-11150-DPW Hon. Judge Douglas P. Woodlock
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#### STIPULATION REGARDING PROTECTIVE ORDER

Plaintiffs John Hancock Life Insurance Company, John Hancock Variable Life Insurance Company, and ManuLife Insurance Company (f/k/a Investors Partner Life Insurance Company) (collectively "John Hancock") and defendant Abbott Laboratories ("Abbott") hereby stipulate pursuant to Fed. R. Civ. P. 26(c)(7) and Paragraph 24 of the Stipulated Protective Order (entered by the Court in this action on July 15, 2005) that Paragraph 12(a) of the Stipulated Protective Order be amended to include the law firm of Munger, Tolles & Olson LLC as "outside counsel" as defined in said Paragraph 12(a). Paragraph 12(a) as amended shall read as follows:

(a) outside counsel and members, associates and employees of the firms of which outside counsel are members. For purposes of this Stipulated Order, "outside counsel" shall mean the firm Choate, Hall & Stewart LLP for plaintiffs John Hancock Life Insurance Company, John Hancock Variable Life Insurance Company, and ManuLife Insurance Company, and the firms Donnelly, Conroy & Gelhaar, LLP, Winston & Strawn, LLP and Munger, Tolles & Olson LLP for defendant Abbott Laboratories;

The Stipulated Protective Order is otherwise unchanged.

#### ABBOTT LABORATORIES

JOHN HANCOCK LIFE INSURANCE COMPANY, JOHN HANCOCK VARIABLE LIFE INSURANCE COMPANY and MANULIFE INSURANCE COMPANY

By its attorneys,

By their attorneys,

## /s/ Michael S. D'Orsi

Peter E. Gelhaar (BBO #188310) Michael S. D'Orsi (BBO #566960) DONNELLY, CONROY & GELHAAR, LLP One Beacon Street, 33d Floor Boston, MA 02108 (617) 720-2880

## /s/ Gregory D. Phillips

Jeffrey I. Weinberger (pro hac vice) Gregory D. Phillips (pro hac vice) MUNGER, TOLLES & OLSON LLP 355 South Grand Avenue, 35th Floor Los Angeles, CA 90012 (213) 683-9276

Dated: August 11, 2006

## /s/ Brian A. Davis

Brian A. Davis (BBO # 546462) Joseph H. Zwicker (BBO # 560219) CHOATE, HALL & STEWART LLP Two International Place Boston, MA 02110 (617) 248-5000

**CERTIFICATE OF SERVICE** 

I, Michael S. D'Orsi, hereby certify that this document filed through the ECF system will

be sent electronically to the registered participants as identified on the Notice of Electronic Filing

(NEF) and paper copies will be sent to those indicated as non registered participants on August

11, 2006.

/s/ Michael S. D'Orsi

Dated: August 11, 2006